



Department of Toxic Substances Control

Maureen F. Gorsen, Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Linda S. Adams
Secretary for
Environmental Protection



Arnold Schwarzenegger
Governor

August 30, 2006

Mr. Arthur J. Lenox
Environmental Remediation
Santa Susana Field Laboratory
5800 Woolsey Canyon Road
Canoga Park, CA 91304-1148

REQUIREMENT FOR SUBMITTAL OF RCRA FACILITY INVESTIGATION WORK PLAN AND INFORMATION REGARDING THE AREA 1 BURN PIT (INCLUDING THE THERMAL TREATMENT FACILITY) SANTA SUSANA FIELD LABORATORY, VENTURA COUNTY

Dear Mr. Lenox:

The Boeing Company (Boeing) recently provided the Department of Toxic Substances Control (DTSC) with new information regarding the types and sources of waste disposed at the Area 1 Burn Pit (transmittal letter dated August 16, 2006). This new information is inconsistent with the initial information that Boeing provided to DTSC. Consequently, DTSC will not proceed at this time with any final decision regarding the characterization or removal elements of the proposed *Revised Interim Measures Work Plan for the Area 1 Burn Pit* (Interim Measures) dated June 9, 2006.

This unanticipated delay in the removal of the waste requires that the erosion and sedimentation control element of the work plan be implemented prior to the rainy season to minimize the potential threat(s) to human health and/or the environment that would result from contaminated rainwater runoff from the area. Consequently, pursuant to section VII.F.2.b of the Post Closure Permit for Areas I and III, DTSC requires Boeing complete implementation of the *Erosion and Sedimentation Control Plan*, dated August 11, 2006, including any DTSC revisions, within 30 days following approval by DTSC and before the rainy season.

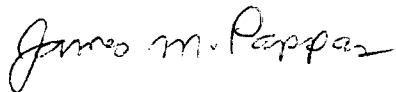
Also, pursuant to section VII.F.2.b of the permit, Boeing must submit to DTSC no later than October 1, 2006, a Resource Conservation and Recovery Act (RCRA) Facility Investigation Work Plan (RFI Work Plan) for a complete characterization of the chemical

contamination of the Area I Burn Pit and surrounding areas. The RFI Work Plan may include elements of the characterization portion of the proposed Interim Measures. In addition the RFI Work Plan shall include but not be limited to the following:

- 1) Historical records and documentation of all activities associated with the Solid Waste Management Unit 4.8 and the Thermal Treatment Facility, heretofore referred to as the Area I Burn Pit.
- 2) A listing of all wastes and waste types, locations from which they came, and listings of where and how wastes were managed at the Area I Burn Pit.
- 3) All supporting historical information used in developing the RFI Work Plan including but not limited to photographs, drawings, invoices, manifests, memorandums, and any other records regarding operations at the Area I Burn Pit.
- 4) An explanation of the rationale for the development of the RFI Work Plan based on an evaluation of all records identified in items 1 through 3 above.
- 5) Demonstration and certification that Boeing has conducted a complete and thorough search for the documents detailed above. Boeing shall include a signed copy of the enclosed signature sheet.
- 6) Procedures to screen soils and debris during soil characterization to ensure radioactive materials were not handled at the Area I Burn Pit. DTSC is requiring Boeing to submit these procedures to the Department of Health Services, Radiologic Health Branch (DHS RHB) for review and concurrence by the submittal date of the RFI Workplan.

If you have any questions regarding this letter please contact Mr. Peter Bailey of my staff at (916) 255-3602.

Sincerely,



James M. Pappas, P.E., Chief
Northern California Permitting and Corrective Action Branch

Enclosure

Mr. Arthur J. Lenox
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cc: Mr. Eric Maher
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SIGNATURE AND CERTIFICATION

Submittal of this information must contain the certification below signed by the principal executive officer or by a duly authorized representative of that person. All pertinent facility records must be reviewed and all available sources of information investigated in order to obtain the requested information, including the personal recollection of longtime employees and past owners and operators.

A person handling hazardous waste who fails to provide information requested under Section 3007 of RCRA and H&SC Section 25358.1 and Chapter 6.5, Article 8 or H&SC is in full violation of the law and it is therefore subject to enforcement action under Section 3008 of RCRA, and subject to revocation of denial (as applicable) of its hazardous waste facility permit.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name of Operator:

Title:

Name of Company:

Date:

Signature: _____

Name of Owner:

Title:

Name of Company:

Date:

Signature: _____

Name of Landowner:

Title:

Name of Company:

Date:

Signature: _____